

COUNT TWO

False Representation of Social Security Number
(42 U.S.C. § 408(a)(7)(B))

The Grand Jury further charges:

On or about December 22, 2017, in Revere, in the District of Massachusetts, the defendant,

MARLON SUAZO SANTOS,

for the purpose of obtaining anything of value from any person, and for any other purpose, did, with intent to deceive, falsely represent a number to be the social security account number assigned by the Commissioner of Social Security to him on an Application for a Massachusetts Driver's License submitted to the Massachusetts Registry of Motor Vehicles, when in fact such number is not the social security account number assigned by the Commissioner of Social Security to him.

All in violation of Title 42, United States Code, Section 408(a)(7)(B).

COUNT THREE
Aggravated Identity Theft
(18 U.S.C. § 1028A(a)(1))

The Grand Jury further charges:

On or about December 22, 2017, in Revere, in the District of Massachusetts, the defendant,

MARLON SUAZO SANTOS,

did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), that is, False Representation of Social Security Number, in violation of Title 42, United States Code, Section 408(a)(7)(B), as charged in Count Two.

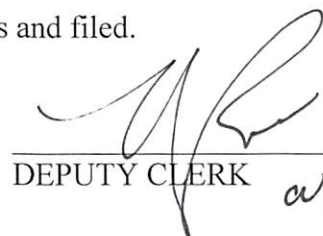
All in violation of Title 18, United States Code, Section 1028A(a)(1).

A TRUE BILL


FOREPERSON


WILLIAM F. ABELY
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: MAY 23, 2019
Returned into the District Court by the Grand Jurors and filed.


DEPUTY CLERK
w/12:57 PM
5/23/19